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Duane Morris®

FIRM and AFFILIATE OFFICES

ANTHONY J. RAO
DIRECT DIAL: (212) 692-1086
PERSONAL FAX: (212) 208-2575
E-MAIL: arao@duanemorris.com

www.duanemorris.com

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February 7, 2014

VIA ECF

Hon. William H. Pauley III
United States District Court
Southern District of New York
Courtroom 20B
500 Pearl Street
New York, NY 10007-1312

Re: Sabrina Penceal et al., v. Empire Beauty School, Inc., et al.; SDNY Case No: 13-cv-7572 (WHP)

Dear Judge Pauley:

The law firm of Duane Morris LLP represents defendants Empire Beauty School, Inc., EEG Inc., EEG LLC, Chic Schools, Inc., Empire Education Group, Inc., Regis Corporation, Frank Schoeneman and Michael D. Bouman (collectively "Defendants") in the above-referenced matter. This letter is sent with the consent of Plaintiffs to request a third extension of time for Defendants to file their response to the Complaint.

Defendants' response to the Complaint is currently due today, February 7, 2014. The parties had hoped to file a stipulation today regarding issues related to Defendants' planned response to the Complaint (which as currently written is in the form of a pre-motion letter requesting permission to file various motions). I am currently lead counsel on this matter, however, today is my last day at Duane Morris and I will be transitioning this case to Duane Morris partner Michael Tiliakos. Additional time is needed for the parties' continued negotiations due to my departure. The parties anticipate they will be able to complete negotiations within the next two (2) weeks. Accordingly, Defendants respectfully request two (2) additional weeks (until February 21, 2014) for Defendants to file their response to the Complaint or to submit a stipulation of the parties regarding matters related to the pleadings. This is Defendants' third request for an extension of time to respond to the Complaint, as the parties have been attempting to work through certain issues related to same. Plaintiffs consent to this request. This extension does not impact any other dates.

DUANE MORRIS LLP

1540 BROADWAY NEW YORK, NY 10036-4086
DMI\4442556.1

PHONE: +1 212 692 1000 FAX: +1 212 692 1020

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In addition, due to the ongoing negotiations, the parties respectfully request a two (2) to four (4) week adjournment (to a date convenient for the court) of the Initial Case Management Conference, currently scheduled for March 14, 2014, to allow the parties to continue to jointly address and resolve issues related to scheduling and management of this matter, including those raised by Federal Rule of Civil Procedure 26(f). This adjournment does not impact any other dates. Both parties jointly request and consent to this adjournment.

Respectfully yours,

DUANE MORRIS LLP



Anthony J. Rao
Partner

cc: Leon Greenberg, Esq. (counsel for Plaintiffs)